

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF PENNSYLVANIA**

CARDIONET, LLC

Plaintiff and Counterdefendant,
and

BRAEMAR MANUFACTURING, LLC,

Plaintiff,

v.

Civil Action No. 12-02517

MEDNET HEALTHCARE
TECHNOLOGIES, INC.,
HEARTCARE CORPORATION OF
AMERICA, UNIVERSAL MEDICAL
INC., and UNIVERSAL MEDICAL
LABORATORY, INC.,

Defendants and
Counterclaimants, and

MEDTEL 24, INC.,
RHYTHMWATCH, LLC, and
AMI CARDIAC MONITORING, INC.,

Defendants.

**JOINT MOTION FOR LEAVE TO FILE MOTIONS *IN LIMINE*,
ACCOMPANYING MEMORANDA, AND RESPONSES UNDER SEAL**

Defendants Mednet Healthcare Technologies, Inc., Heartcare Corporation of America, Universal Medical Inc., Universal Medical Laboratory Inc., MedTel24, Inc., RhythmWatch, LLC, and AMI Cardiac Monitoring, Inc. (collectively “Defendants”) and Plaintiffs CardioNet, LLC and Braemar Manufacturing, LLC (collectively “Plaintiffs”) jointly seek leave to file their motions *in limine*, accompanying memoranda, responses, and exhibits that contain either

Defendants' or Plaintiffs' Highly Confidential Information under seal, and in support thereof state as follows:

1. On January 10, 2013, pursuant to the Court's Fourth Amended Scheduling Order (D.I. 129), both Plaintiffs and Defendants will file one or more motions *in limine* containing, and appending as exhibits, information which has been designated as Highly Confidential pursuant to the Protective Order (D.I. 45) entered in this action.

2. In this case, the interests in sealing are compelling. The sealing aims to prevent the public disclosure of highly sensitive information of both Plaintiffs and Defendants including but not limited to information regarding their confidential business operations, financials, and the operation of the accused system and services.

3. Accordingly, Plaintiffs and Defendants jointly respectfully request permission to file their motions *in limine*, accompanying memoranda, responses, and exhibits that contain either Defendants' or Plaintiffs' Highly Confidential Information under seal.

Dated: January 6, 2014

Respectfully Submitted:

By: /s/ Andrew J. Koopman

Benjamin E. Leace
Andrew J. Koopman
Christopher H. Blaszkowski
RATNERPRESTIA
1235 Westlakes Drive
Suite 301
Berwyn, PA 19312
610 407 0700

Attorneys for Defendants

By: /s/ James J. Rodgers

James J. Rodgers
DILWORTH PAXSON LLP
Jrodgers@dilworthpaxson.com
1500 Market St.
Suite 3500E
Philadelphia, PA 19102

Attorneys for Plaintiffs

ROPES & GRAY LLP

Bradford J. Badke
Ching-Lee Fukuda
Khue V. Hoang
1211 Avenue of the Americas
New York, NY 10036-8704